

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DISCRETE HOLDINGS LLC,)	
SEAN HSIEH and JORDAN LEVY,)	
)	
Plaintiffs,)	C.A. 1:21-cv-01647-CFC
)	
v.)	
)	
)	
INTRADO CORPORATION f/k/a/)	
WEST CORPORATION,)	
)	
Defendant.)	

[PROPOSED] ORDER

The Court, having considered Defendant's Motion to Compel and Letter in support thereof (the "Motion to Compel") seeking an order compelling Plaintiffs to re-produce documents with metadata and to produce an amended privilege and redaction log, and good cause having been shown,

IT IS HEREBY ORDERED this ____ day of _____, 2023, that:

1. Defendant's Motion to Compel is GRANTED;
2. Within three (3) days of this Order, Plaintiffs shall:
 - a. Re-produce the documents in Plaintiffs' March 15, 2023 and March 29, 2023 productions in a manner that preserves the familial relationships of the documents;

- b. Produce the metadata associated with all documents in the re-production ordered in Paragraph 2(a) above; and
 - c. Produce an amended privilege and redaction log identifying all redactions in the re-production ordered in Paragraph 2(a) above and the basis for each redaction, in compliance with FRCP 26(b)(5); and
3. Intrado is awarded its attorneys' fees associated with its Motion to Compel.

UNITED STATES DISTRICT JUDGE
Chief Judge Colm F. Connolly